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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC. AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL THEIR RESPONSE TO  
WAYMO'S SUBMISSION TO SPECIAL  
MASTER COOPER REGARDING THE  
JACOBS DOCUMENTS**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and  
7 Ottomotto LLC’s Administrative Motion to File Under Seal Their Response to Waymo’s Submission  
8 to Special Master Cooper Regarding the Jacobs Documents (the “Administrative Motion”). The  
9 Administrative Motion seeks an order sealing highlighted portions of Uber’s Response and of Exhibit  
10 J to the Declaration of Sylvia Rivera (“Rivera Exhibit J”), as well as the entirety of Exhibits A-E to  
11 the Declaration of Marcie Brimer (“Brimer Exhibits A-E”), Exhibits A-D to the Declaration of Samuel  
12 Cortina (“Cortina Exhibits A-D”), Exhibit A to the Declaration of Maxwell Pritt (“Pritt Exhibit A”),  
13 and Exhibits A-F, I, and L-P to the Declaration of Sylvia Rivera (“Rivera Exhibits A-F, I, and L-P”).

14 3. The portions of Pritt Exhibit A and Rivera Exhibits B-D and M-O identified below  
15 contain or refer to trade secret and confidential business information, which Waymo seeks to seal.

16 4. Pritt Exhibit A (portions highlighted in green in version filed herewith) and Rivera  
17 Exhibits B-D and M-N (portions highlighted in green in version filed herewith) contain, reference,  
18 and/or describe Waymo’s asserted trade secrets. The information Waymo seeks to seal includes the  
19 confidential design and functionality of Waymo’s proprietary autonomous vehicle system, including  
20 its LiDAR designs, which Waymo maintains as secret. I understand that these trade secrets are  
21 maintained as secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s  
22 business (Dkt. 25-31). The public disclosure of this information would give Waymo’s competitors  
23 access to descriptions of the functionality or features of Waymo’s autonomous vehicle system. If such  
24 information were made public, I understand that Waymo’s competitive standing would be  
25 significantly harmed.

26 5. Rivera Exhibit O (portions highlighted in green in version filed herewith) contains,  
27 references, and/or describes Waymo’s highly confidential and sensitive business information. The  
28 information Waymo seeks to seal regards the confidential analysis of Waymo’s business and

competition, including potential partnerships and actual and potential acquisitions. I understand that this confidential business information is maintained by Waymo as secret. The public disclosure of this information would give Waymo's competitors access to in-depth insight into—and analysis of—Waymo's business strategy for its autonomous vehicle system. If such information were made public, I understand that Waymo's competitive standing would be significantly harmed.

6. Waymo's request to seal is narrowly tailored to those portions of Pritt Exhibit A and Rivera Exhibits B-D and M-O that merit sealing.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on December 12, 2017.

By /s/ *Felipe Corredor*

Felipe Corredor  
Attorneys for WAYMO LLC

## ATTESTATION

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven

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Charles K. Verhoeven